

 ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA :

- v. -

SUPERSEDING INDICTMENT
S1 15 Cr. 533 (CS)

CENGIZ DEMIR, :

Defendant. :

- - - - -X

COUNT ONE

(Kidnapping)

The Grand Jury charges:

1. From on or about June 29, 2015, up to and including on or about June 30, 2015, in the Southern District of New York and elsewhere, CENGIZ DEMIR, the defendant, knowingly did seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise a person, when the person was willfully transported in interstate commerce, and CENGIZ DEMIR traveled in interstate and foreign commerce and used a means, facility, and instrumentality of interstate commerce in committing and in furtherance of the commission of the offense, to wit, CENGIZ DEMIR seized, confined, abducted, kidnapped and carried away Victim-1, an adult female, and transported Victim-1 from New York to New Jersey, for the purpose of preventing the disclosure of DEMIR's alleged sexual abuse of Victim-2, Victim-1's seven-year-old daughter.

(Title 18, United States Code, Section 1201(a).)

COUNT TWO

(Kidnapping)

The Grand Jury further charges:

2. From on or about June 29, 2015, up to and including on or about June 30, 2015, in the Southern District of New York and elsewhere, CENGIZ DEMIR, the defendant, having attained the age of eighteen years, knowingly did seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise a victim, who had not attained the age of eighteen years and DEMIR was not a parent, grandparent, brother, sister, aunt, uncle, and an individual having legal custody of the victim, when the victim was willfully transported in interstate and foreign commerce, and CENGIZ DEMIR traveled in interstate and foreign commerce and used a means, facility, and instrumentality of interstate commerce in committing and in furtherance of the commission of the offense, to wit, CENGIZ DEMIR seized, confined, abducted, kidnapped and carried away Victim-2, a seven-year old girl, and transported Victim-2 from New York to New Jersey, for the purpose of preventing the disclosure of DEMIR's alleged sexual abuse of Victim-2.

(Title 18, United States Code, Section 1201(a) and (g).)

COUNT THREE

(Interstate Domestic Violence)

The Grand Jury further charges:

3. From on or about June 29, 2015, up to and including on or about June 30, 2015, in the Southern District of New York and elsewhere, CENGIZ DEMIR, the defendant, knowingly travelled in interstate and foreign commerce with the intent to kill, injure, harass, and intimidate a spouse, intimate partner, and dating partner, and, in the course of and as a result of such travel, committed and attempted to commit a crime of violence against that spouse, intimate partner and dating partner, to wit, CENGIZ DEMIR, the defendant, traveled from New York to New Jersey with Victim-1 and in the course of that travel, the defendant committed and attempted to commit a crime of violence against Victim-1.

(Title 18, United States Code, Section 2261(a)(1) and (b).)

COUNT FOUR

(Tampering With a Witness)

The Grand Jury further charges:

4. In or about July 2015, in the Southern District of New York and elsewhere, CENGIZ DEMIR, the defendant, (1) knowingly did attempt to corruptly persuade another person, with intent to influence, delay and prevent the testimony of a person in an official proceeding, and (2) corruptly did attempt to obstruct, influence, and impede an official proceeding, to wit, CENGIZ DEMIR, the

defendant, directed another person to shut down Victim-1's phone in an effort to impede law enforcement from contacting Victim-1, thereby preventing Victim-1 from offering testimony against the defendant in an official proceeding.

(Title 18, United States Code, Section 1512(b)(1) and (c)(2).)

COUNT FIVE


(Obstruction of Justice)

The Grand Jury further charges:

5. In or about July 2015, in the Southern District of New York and elsewhere, CENGIZ DEMIR, the defendant, knowingly and corruptly endeavored to influence, obstruct, and impede the due administration of justice, to wit, CENGIZ DEMIR, the defendant, with knowledge that an official proceeding concerning the allegations in this Indictment was scheduled in the United States District Court for the Southern District of New York, directed another person to shut down Victim-1's phone in an effort to impede law enforcement from contacting Victim-1, thereby preventing Victim-1 from offering testimony against the defendant in an official proceeding.

(Title 18, United States Code, Section 1503(a) and (b).)


FOREPERSON


PREET BHARARA
United States Attorney

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Dean A. Mott - Forfeiture

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United States Attorney for Southern District of New York
(914) 993-1902

10/14/15

Superseding

Indictment

McCarthy 5: